

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,

Debtors.

)
) Chapter 11
)

) Case No. 25-10068 (CTG)
) Jointly Administered
)

) **Hearing Date: To be Determined**
) **Objection Deadline: August 13, 2025 at 4:00**
) **p.m. (ET)**
)

**NOTICE OF MOTION OF WOODMONT COMPANY, INC., AS RECEIVER FOR
MOBILE FESTIVAL ACQUISITION, LLC FOR ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. § 503(B)(1)**

PLEASE TAKE NOTICE that on July 31, 2025, Woodmont Company, Inc., as Receiver for Mobile Festival Acquisition, LLC (“Movant”) filed the *Motion of Woodmont Company, Inc., as Receiver for Mobile Festival Acquisition, LLC for Allowance and Payment of Administrative Expense Claim* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before **August 13, 2025, at 4:00 p.m. (ET)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon Movant’s undersigned counsel so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **date to be determined** before the Honorable Craig G. Goldblatt in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, courtroom 7, Wilmington, Delaware 19801, if an objection is filed.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OF A HEARING.

Dated: July 31, 2025

Respectfully submitted,

/s/ Michael J. Joyce

Michael J. Joyce (No. 4563)

JOYCE, LLC

1225 King Street

Suite 800

Wilmington, DE 19801

(302)-388-1944

mjoyce@mjlawoffices.com

*Counsel to Woodmont Company, Inc., as Receiver
for Mobile Festival Acquisition, LLC*